

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

OLYMPIA HOTEL MANAGEMENT,
LLC, a Delaware limited liability company,

Plaintiff,

v.

THE BEND HOTEL DEVELOPMENT
COMPANY, LLC, an Illinois limited
liability company,

Defendant.

Civil Action No. 2:20-cv-00136-NT

JOINT MOTION TO ENLARGE DEADLINES AND STAY DISCOVERY

Plaintiff Olympia Hotel Management, LLC (“Olympia”) and Defendant The Bend Hotel Development Company, LLC (“Bend”) jointly move the Court to enlarge all deadlines in the instant litigation, and stay the parties’ respective discovery obligations, for a period of approximately 90 days so as to accommodate the parties’ efforts to reach a negotiated resolution to this and related litigation.

In support of this motion, the parties state as follows:

1. In the instant litigation, the parties have engaged in various discovery efforts, including providing responses to interrogatories and producing documents. The parties envision significant additional written discovery before beginning depositions.
2. In addition to the instant litigation between Olympia and Bend, an Olympia affiliate and Bend have been engaged in litigation—concerning the same hotel project—in Illinois state court for nearly two years.
3. Olympia and Bend have agreed to seek a negotiated resolution to both the instant litigation and the Illinois litigation, but wish to do so without also incurring the

significant imminent expense associated with continued discovery efforts in this litigation.

4. The parties have agreed to seek a judicial settlement conference through the District of Maine and intend to contact Julie Rodrigue immediately to schedule such a conference.

5. Accordingly, the parties respectfully request the Court enlarge all future deadlines in this case as follows to provide additional time for the parties to schedule and complete a judicial settlement conference:

Event	Current Deadline	Proposed New Deadline
Deadline to designate rebuttal experts ¹	4/1/2021	7/2/2021
Deadline to make written settlement demand	4/15/2021	7/16/2021
Deadline to respond to written settlement demand	4/29/2021	7/30/2021
Deadline to complete discovery	4/29/2021	7/30/2021
Deadline to file notice of intent to seek summary judgment	5/6/2021	8/6/2021
Deadline for dispositive motions and all <i>Daubert/Kumho</i> motions	5/20/2021	8/13/2021
Expected trial date	8/2/2021	11/1/2021

6. Consistent with the enlargement of time the parties seek, the parties also respectfully request the Court stay both parties' obligations to respond to or produce discovery through Friday, June 4, 2021, a period of 89 days, so that the parties may concentrate their efforts on resolving this case while avoiding the significant discovery costs associated with this litigation.

¹ Neither party designated any expert witnesses with respect to their affirmative claims by the February 25, 2021, deadline.

WHEREFORE, Plaintiff Olympia Hotel Management, LLC and Defendant The Bend Hotel Development Company, LLC respectfully request that the Court:

- a. enlarge the deadlines in this case as set forth above; and
- b. stay the parties' obligations to respond to or produce discovery through June 4, 2021.

DATED: March 8, 2021

Respectfully submitted,

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*Attorney for Plaintiff and Counterclaim
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**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

I hereby certify that I caused the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system which sent notification of such filing to all counsel of record.

Dated this 8th day of March, 2021.

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